

EXHIBIT B

Fix, Daniel B.

From: Fix, Daniel B.
Sent: Friday, January 26, 2018 10:53 AM
To: 'Jason Leibowitz'
Cc: Tillem, David; 'Jerry Feuerstein'
Subject: RE: Case No. 16-11644-shl / In re 261 East 78 Lofts LLC - MAD-124 - Document Request Follow Up

Hi Jason,

Per the letter dated January 11, 2018, we were before Judge Lane this past Wednesday to discuss, among other things, the status of discovery in the claim objection between the debtor 261 East 78 Lofts LLC and Joseph Zelik.

With respect to Kriss & Feuerstein's responsiveness to the subpoena, I explained to Judge Lane that thus far, you had provided us documents from the closing file from the February 27, 2014 for both loans. And, that with respect to additional documents and information, including emails and communications, you and I had engaged in lengthy "meet and confer" discussions. I also explained that while we had not yet received a formal written response to our subpoena and follow up letters, you had indicated during our last conversation that emails/communications would be forthcoming. We will also need to get some dates for availability for deposition. To that end, Judge Lane suggested that we continue along our current path and follow up to get a firm commitment as to when we can expect production of the emails/communications and any other outstanding requests that we have, including scheduling the deposition.

The last time we spoke on January 12, 2018, you had mentioned that you would be responding to our letter and that we could expect emails/communications responsive to the subpoena in early/mid February. On that account, it should be inferred that any emails/communications responsive to the subpoena should also include the emails/communications from and to Andrew Leffler.

We also discussed documents (notwithstanding the already produced client ledger 2/28/14 - 3/12/14) relative to the receipt and distribution of the transaction funding between February 27 and 28, 2014. We look forward to your response and as always if you need to discuss further in the interim, please let me know your availability to have a call.

Thanks,

Dan

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From: Fix, Daniel B.
Sent: Thursday, January 11, 2018 6:38 PM
To: 'Jason Leibowitz'
Cc: Tillem, David; Jerry Feuerstein
Subject: RE: Case No. 16-11644-shl / In re 261 East 78 Lofts LLC - MAD-124 - Document Request Follow Up